

REMARKS

Claims 1, 3-8, 54-57 and 72-96 are currently pending. Claims 1, 4, 6, 78, 83, 90 and 91 are currently amended. Claims 92-96 are new. Claims 37-41 are cancelled in this amendment.

The Examiner objected to Claim 90. Applicant has amended Claims 90 and 91 to correct the typographical error noted by the Examiner.

Claims 88-89 and 91 are rejected under 35 U.S.C. 102(e) as being anticipated by Gisby et al. (US 6,044,146).

Regarding Claim 88,

Claim 88 recites:

*88. (Previously Presented) A method comprising:
transmitting or receiving a first request for a first real-time meeting between a requestor and a first target, the requestor and the first target being individuals;
determining that the first target is unavailable, using a computing system;
waiting until the first target changes from being unavailable to being available;
when the first target is available, determining if the requester is available;
if the requestor is available, then initiating the first real-time meeting; and
if the requester is unavailable, then waiting until a time the requestor becomes available.*

In rejecting Claim 88, the Examiner states:

The limitation “if the requester is unavailable, then waiting until a time the requestor becomes available” does not occur in methods where the requester is available, in the previous limitations. Therefore, since Gisby et al. teaches that the requester is available, the limitation “if the requester is unavailable, then waiting until a time the requestor becomes available” is not required.

The Examiner appears to be expressly admitting that the last element of Claim 88 “does not occur” and that “‘waiting until a time the requestor becomes available’ is not required” in the teachings of Gisby. To this extent, the Applicant agrees with the Examiner’s statement.

The Examiner is reminded that “[w]hen evaluating the scope of a claim, every limitation in the claim must be considered,” (Emphasis in original) and “[a] claim is anticipated only if

each and every element as set forth in the claim is found,” (See MPEP § 2106.II.C. and MPEP § 2131).

Here the Examiner has failed to point out the limitations “*if the requester is unavailable, then waiting until a time the requestor becomes available*,” in the cited art. As such, the Examiner has failed to make a prima facie case for the rejection of Claim 88. The Examiner must either point out these limitations within the prior art or allow Claim 88.

The Examiner appears to be arguing that the limitations of Claim 88 are not required in the teachings of Gisby. The Applicant respectively points out that this argument does not support the rejection of Claim 88, even if true. A rejection under 35 U.S.C 102(e) requires that the cited art must teach “each and every element as set forth in the claim is found.” The fact that limitations of a claim is not required in the teachings of the prior art supports the allowability of the claim rather than its rejection.

The Applicant also notes that in the rejection of Claim 1, the Examiner takes the position that Gisby teaches “*a possible availability status [of R-A] includes not available*.” Thus, according to the Examiner the condition that a requester is unavailable can occur.

The Applicant, therefore, requests that the Examiner specifically point out a teaching of “*if the requester is unavailable, then waiting until a time the requestor becomes available*,” as recited in Claim 88, or allow Claim 88 and those claims that depend therefrom. If the Examiner intends to use a standard for rejection under 102(e) other than those of MPEP § 2106.II.C. and MPEP § 2131 as quoted above by the Applicant, then the Applicant requests that the Examiner clearly articulate this standard and cite statutory support.

Regarding Claim 89,

Claim 89 recites:

89. (Previously Presented) The method of Claim 88, further comprising:

in response to the requester becoming available, determining if the first target is still available;
if the first target is still available, then initiating the first real-time meeting; and
if the first target is unavailable, then waiting until the first target becomes available.

Regarding Claim 89, the Examiner states “claim 89 is directed to and further limits the limitation ‘if the requester is unavailable, then waiting until a time the requestor becomes available’ of claim 88.” The Applicant traverses this statement. Claim 89 adds three additional limitations to Claim 88. These limitations are not directed merely to one specific limitation of Claim 88, rather they are added to Claim 88 as a whole.

The Examiner further states, “the limitation ‘if the requester is unavailable, then waiting until a time the requestor becomes available’ is not required, and therefore the limitations of claim 89 further do not occur.” This statement is likewise traversed. This appears to be an express admission that the cited art does not teach the limitations of Claim 89. Given this admission, the Applicant requests that the Examiner allow Claim 89. The Examiner appears to be arguing that Gisby doesn’t include limitations of Claim 88 and 89. These arguments support allowability of these claims.

In addition, if for the sake of argument one agrees with the Examiner’s suggestion in the rejection of Claim 1, a possible availability status of the requestor is “not available,” thus, the limitations of Claim 89 can occur.

The Applicant further believes that Claim 89 is allowable for at least the same reasons as Claim 88, from which it depends.

Regarding Claim 91,

Claim 91 recites:

91. (Currently Amended) The method of claim 88, further comprising;
transmitting or receiving a second request for a second real-time meeting between a
second requestor and the first target, the second request being transmitted or received between a
time the first request is transmitted or received and a time the first real-time meeting is initiated;
and

initiating the second real-time meeting prior to the first real-time meeting if the second requester becomes available before the first requester.

In rejecting Claim 91 the Examiner suggests that figures 2-3, column 3, lines 1-20, column 5, lines 20-40, column 6 lines 35-45, or column 7, lines 1-15 and 35-50, teach the limitation “*initiating the second real-time meeting prior to the first real-time meeting if the second requester becomes available before the first requester.*” The Examiner traverses this suggestion.

Figures 2-3 illustrate call requestors being held in a queue and being matched with agents as the agents become available. The Applicant is unable to identify any teaching that the order in which real-time meetings are initiated is dependent on the order in which requestors become available, particularly where that order is different than the order in which requests were made. Rather, it appears that the requestors who are in the queue are always available. The Applicant is unable to identify any teaching of an unavailable requestor in a queue within Gisby. Further, there does not appear to be any mechanism taught that would allow a requester to become available after being unavailable while in the queue. In Gisby it appears that requesters are assumed to always be available if they are in the queue.

Column 3, lines 1-20 teach a process by which calls of higher priority may bump calls of lower priority. These teachings, thus, do not appear to be related to requestors becoming available, rather in these teachings, it is agents not requestors that become available and unavailable. Requestor always appear to be available, although some may have different priorities than others. The Applicant is unable to identify any teaching that the order in which real-time meetings are initiated is dependent on the order in which requestors become available, particularly where that order is different than the order in which requests were made.

Column 5, lines 20-40 teach the priority and bumping system of Figure 3. As discussed above, these teachings appear to be dependent on the availability of Agents rather than the availability of requesters. Further, they do not teach that the order in which real-time meetings are initiated is dependent on the order in which requestors become available, particularly where that order is different than the order in which requests were made.

Column 6 lines 35-34 teach actions based on the availability of agents rather than requesters.

Column 7 lines 1-15 and 35-50 teach actions based on the availability and capability of agents rather than requesters.

The Applicant is, thus, unable to identify any teaching of “*initiating the second real-time meeting prior to the first real-time meeting if the second requester becomes available before the first requester,*” as recited in Claim 91, in the cited art. In particular, where “*the second request being transmitted or received between a time the first request is transmitted or received and a time the first real-time meeting is initiated.*” The Applicant, therefore, requests that the Examiner point out teachings of these limitations within the cited art with particularity, or allow Claim 91.

The Applicant further believes that Claim 91 is allowable for at least the same reasons as Claim 88, from which it depends.

Claims 1, 3-8, 54-55, 72-79, 81-82, 84-85 and 87 were rejected under 35 U.S.C. 103(a) as being unpatentable over Gisby et al. in view of Yacenda et al. (U.S. 5,515,426).

Regarding Claim 1,

Claim 1 recites:

1. (Currently Amended) A computer-implemented method for the intermediation of real time meetings, comprising:
receiving an indication by a requester system that a requester (R-A) wants to request a realtime meeting M-A with a target T-A;

sending to a decider system (D) a request to conduct a real time meeting M-A;
queuing the request for the meeting M-A by the decider system;
receiving by the decider system (D) an availability status of T-A;
receiving by the decider system (D) an availability status of R-A, where a possible availability status includes not available;
receiving an indication by the requester system that a requester (R-B) wants to request a realtime meeting M-B with target T-B, the meeting M-B to be disjoint in time with the meeting M-A; and such that one of the parties to M-A (R-A or T-A), known as the 'common party' is also the same as one of the parties to M-B (R-B or T-B) and thus there are three distinct parties, the decider D being associated with the common party;
sending to the decider system (D) a request to conduct a real time meeting M-B;
queuing the request for the meeting M-B by the decider system, such that requests for at least two distinct meetings, disjoint in time are placed in the queue, so that multiple pending real time meetings for the common party are in the queue at the same time;
receiving by the decider system (D) an availability status of target T-B;
receiving by the decider system (D) an availability status of the requester R-B, where a possible availability status includes not available;
initiating, by the decider, one of the two meetings M-A and M-B by connecting the common party and the other party to that meeting when the common party and that other party are mutually available; and
dequeuing the request for a meeting.

With respect to Claim 1, the Applicant and Examiner disagree as to the interpretation of the claim term “availability status.” The Examiner appears to believe that “availability status” is taught by merely a priority ranking among requesters, while the Applicant does not. The Examiner is referred to the Applicant’s previous arguments.

Further, in order that this issue may be succinctly argued on appeal, the Applicant request that the Examiner clarify with particularity “receiving by the decider system (D) an availability status of R-A, where a possible availability status includes not available.” Specifically, it is not clear to the Applicant how a prioritization teaches availability status that includes “not available.” In *Gisby*, all requestors appear to be available even though they may have different priority. The terms “priority” and “availability” clearly have substantially different dictionary definitions. Finally, the examiner is referred to the specification as filed which clearly treat the status of a requester and the priority of a request as different things, see for example page 3 lines 3-8 and page 15 lines 14-15.

Further, the Applicant previously argued:

in rejecting Claim 1 the Examiner states “Yacenda et al. discloses that the requestor (who called an unavailable target party) leaves his/her number for callback and then when the target party becomes available, the requestor is no longer available (and thus his /her status is unavailable).” The Applicant traverses this statement.

Those parts of Yacenda cited by the Examiner teach determining if a **called** party is unavailable. See, for example, step 1910 in Fig. 24. In the context of Claim 1, the called party would be the target and the caller would be the requester. Thus, the unavailability that is determined in Yacenda is again that of the target not a requestor. (Emphasis in original)

The Examiner does not appear to have responded to this argument. The Examiner is reminded that the Examiner must respond to these arguments. Specifically, MPEP §707.07(f) is entitled “Answer All Material Traversed” and states “[w]here the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it.” The Applicant, therefore, again requests that the Examiner point out a teaching of “*receiving by the decider system (D) an availability status of R-A, where a possible availability status includes not available,*” where it is the availability of the **requester** that is received, or allow Claim 1 and those claims that depend therefrom.

Further, the Applicant previously argued:

in the teachings of Yacenda the caller presumably hangs up after setting up the call back options. This action does not necessarily make the caller unavailable in some embodiments of the current invention. A caller can hang up and still be available. Availability is with regard to whether a party is ready to join in a meeting (e.g., call) and not whether they are holding on the line. See for example, page 3 lines 3-6, and page 6 line 12 through page 7 line 6 of the current specification as filed. To suggest that the caller hanging up teaches receiving an availability status of not available would be interpreting the term availability status in a manner that is contradictory to the specification.

The Examiner does not appear to have responded to this argument. The Applicant requests that the Examiner do so or allow Claim 1, and those claims that depend therefrom.

Further, the Applicant previously argued that the combination suggest by the Examiner would result in an unworkable combination. (page 19 of previous response) In response the Examiner states “Examiner utilized Yacenda et al. to teach the concept that a possible availability status of the requestor R-A or R-B includes not available. Examiner did not really [sic] on Yacenda et al. to disclose the underlying system on which the method operates. Yacenda et al. discloses that a requestor disconnects from the system and this is unavailable because he/she is no longer in the queue waiting to connect with the second party.

To establish a prima facie case of obviousness, three basic criteria must be met. The second of which is that there must be a reasonable expectation of success to modify the reference or to combine reference teachings. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03.

In rejecting under 103, the burden is on the Examiner not merely to show the teachings of limitations within separate art but to show that these teachings would be obvious to combine. The decision in In re Vaeck stands for the point that a combination that would not be likely to be successful would not be obvious.

The Examiner is combining the teaching of Yacenda, specifically an availability status that includes “unavailable,” with those of Gisby. However, the Applicant points out that Yacenda teaches that the availability status of “unavailable” is **only** available under a specific set of conditions, e.g., that the requester and target be on the same PBX, (see previous response). Presence on the same PBX is a requirement for the status of “unavailable” in Yacenda. This specific set of conditions is not met within the system of Gisby. Thus, according to the teachings of Yacenda, it would not be possible to include an availability status that includes “unavailable,” within a system such as that of Gisby. There is, therefore, not a reasonable expectation of success in the combination suggested by the Examiner. The Examiner cannot

add the concept of “unavailable” to Gisby without the requirements taught in Yacenda. To do so would be contrary to the teachings of Yacenda.

In response to the Examiner’s statement that “Examiner utilized Yacenda et al. to teach the concept that a possible availability status of the requestor R-A or R-B includes not available. Examiner did not really [sic] on Yacenda et al. to disclose the underlying system on which the method operates,” the Applicant points out that while Yacenda need not disclose the “underlying system,” the teaching to be combined with Gisby must at least work within the system of Gisby. As pointed out above, this is not the case.

For at least the above reasons, the Applicant believes that Claim 1 and those claims that depend therefrom are allowable.

Regarding Claim 3,

Claim 3 recites:

3. (Previously Presented) The method of claim 1, wherein a system of the target T-A is polled to determine the availability of target T-A.

In response to the Applicant’s arguments that the cited art does not teach polling, the Examiner states “the term poll means to survey in the broadest reasonable interpretation of the term.” The Applicant traverses this statement.

According to MPEP § 2111.01.II, the ordinary meaning of a claim term is the meaning that the term would have to a person of ordinary skill in the art. *Phillips v. AWT Corp.* It is the position of the Applicant that one of ordinary skill in the art would equate the term “poll” with the term “survey.” Rather, in the arts of computer science and communication the term “poll” has a much more specific meaning. For example, the Microsoft Computer Dictionary 5th Ed. defines polling as:

The process of periodically determining the status of each device in a set so that the active program can process the events generated by each device, such as whether a mouse

button was pressed or whether new data is available at a serial port. This can be contrasted with event-driven processing, in which the operating system alters a program or routine to the occurrence of an event by means of an interrupt or message.

Likewise the Encyclopedia of Technology Terms (Que press 2001) defines polling as:

In electronic communication, 'polling' is the continuous checking of other programs or devices by one program or device to see what state they are in, usually to see whether they are still connected or want to communicate.

Specifically, in multipoint or multidrop communications (a controlling device with multiple devices attached that share the same line), the controlling device sends a message to each device, one at a time, asking each whether it has anything to communicate (in other words, whether it wants to use the line).

These definitions are provided merely for the purposes of example. However, they characterize polling as a specific type of communication mode to which there alternatives. The Applicant is unable to identify any teaching in the cited art that Gisby uses the specific type of communication included in "polling," rather than one of the alternatives.

The Applicant respectfully points out that the Examiner now has the burden of either accepting these definitions for the term "poll," or to provide rebuttal evidence.

The Applicant is unable to identify any teaching within Gisby that fit within the term polling as used in communications and computer science. Therefore, Gisby does not teaching "*wherein a system of the target T-A is polled to determine the availability of target T-A.*," as suggested by the Examiner.

For at least these reasons as well as those discussed with reference to Claim 1, the Applicant believes that Claim 3 is allowable.

Regarding Claims 4 and 6,

Claim 4 recites:

4. (Currently Amended) The method of claim 1, wherein the system of the target T-A pushes the availability status of target T-A to the decider system.

Claim 6 recites:

6. (Previously presented) The method of claim 1, wherein the system of a party pushes the party's availability status to the decider system.

Claims 4 and 6, as amended includes the term “pushes.” The Applicant respectively points out that, like polling, the term push or pushing has specific meaning to one of ordinary skill in the art of communications or computer science.

Regarding Claim 5,

Claim 5 recites:

5. (Previously presented) The method of claim 1, wherein a system of a party is polled to determine the party's availability.

The Applicant believes that Claim 5 is allowable for at least the same reasons as Claims 3 and 1. Specifically, the Applicant believes that the Examiner is misinterpreting the term “polling.” And that Gisby does not teach “polling” as would be understood by one of ordinary skill in the art.

Regarding Claims 7, 8 and 54, the Applicant believes that Claims 7, 8 and 54 are allowable for at least the same reasons as Claim 1 from which they depend. For example, call priority is not equivalent to caller availability as suggested by the Examiner.

Regarding Claim 55:

Claim 55 recites:

55. (Previously Presented) The method of claim 54, wherein the availability status is one of in, out, and unknown.

In rejecting Claim 55 the Examiner again suggests that the teaching of “priority” teaches “*availability status*.” In response the Applicant previously pointed out that, in Claim 55, the “*availability status*” is specified as being “*one of in, out, and unknown*.” The Applicant also pointed out that it would not make sense for a priority to be “*one of in, out, and unknown*.”

The Examiner does not appear to have responded to this argument. The Applicant, therefore, again requests that the Examiner specifically point out how a teaching of priority teaches an “*availability status*” of “*unknown*,” or allow Claim 55.

Regarding Claims 72-77, 79, 81 and 82,

It is the position of the Applicant that Claims 72-77, 79 and 81 are allowable for at least the same reasons as Claim 1, from which they depend.

Regarding Claim 78,

Claim 78 recites:

78. (Currently Amended) The method of claim 1, wherein a non-common requester R-A or R-B is party to another, distinct meeting request.

Claim 78 has been amended to clarify that the requestor of Claim 78 is one of the requestors R-A or R-B of Claim 1. Thus, at least one of these requestors is party to another, distinct meeting request. See also new Claim 92 which depends from Claim 78.

It is the position of the Applicant that the callers of Gisby are not taught to be a party to more than one distinct meeting request

Regarding Claim 84,

Claim 84 recites:

84. (Previously Presented) the method of claim 1, wherein the target is a specific individual selected by the requestor.

The Examiner expressly admits that “[n]either Gisby et al. nor Yacenda et al. expressly disclose that the target is a specific individual selected by the requestor.” The Examiner further “takes official notice that it is old and well known in the telephone art for a calling party to request a specific individual when placing a call to a second organization, such as when a person calls a company and asks to speak with a certain manager.”

It is the Applicant’s position that even if it were “old and well known in the telephone art for a calling party to request a specific individual when placing a call to a second organization, such as when a person calls a company and asks to speak with a certain manager,” this does not teach the limitations of Claim 84.

Specifically, in the rejection of Claim 1, from which Claim 84 depends, the Examiner suggests that the Agents 1-4 teach the targets. (Because Claim 84 depends from Claim 1, the Examiner’s rejection of Claim 84 must be consistent with this interpretation.) Gisby does not appear to teach a system in which a caller can specify a particular one of these agents. Thus, even if it were well known in the art to request a specific individual, there does not appear to be a mechanism taught in the cited art that would allow such a request to be made in the system of Gisby. The Applicant requests that the Examiner point out such a mechanism in the cited art or allow Claim 84.

Alternatively, one could for the sake of argument assume that the mechanism for making this request was by asking “to speak with a certain manager,” as suggested by the Examiner. In this case, the manager would be the target who is reached by making a verbal request to a person that answers the phone. In this scenario, where the manager not the person who answers the phone is the target, the cited art no longer teaches “receiving by the decider system (D) an availability status of T-A,” as recited in Claim 1.

This is because it is the person who answers that phone whose availability is necessary for the phone to be answered and this person is not the target. The Applicant, therefore, requests that the Examiner specifically point out a consistent teaching of “*wherein the target is a specific individual selected by the requestor*,” as recited in Claim 84 and “*receiving by the decider system (D) an availability status of T-A*,” as recited in Claim 1.

Further, Gisby is quite specific that “[d]estinations, in the call center agent stations are selected on a basis of agent availability,” (abstract). This “maximizes efficiency of call centers,” (Col. 3 lines 25-26). To allow callers to select specific targets would reduce the efficiency of call centers. Thus, Gisby teaches away from assigning destinations based on a selection made by the requestor.

For at least these reasons and those discussed with respect to Claim 1, the Applicant believes that Claim 85 is allowable.

Regarding Claims 85 and 87, the applicant believes that Claims 85 and 87 are allowable for at least the same reasons as Claims 1 and 84.

Claims 56-57 and 80 were rejected under 35 U.S.C. 103(a) as being unpatentable over Gisby in view of Yacenda and in further view of Vaio (U.S. 6,272,216.

Regarding Claim 56,

Claim 56 recites:

56. (Previously Presented) The method of claim 1, further comprising displaying an availability status of the target T-A on the requester system, along with an indication that the requestor has requested a meeting with the target.

In rejecting Claim 56 the Examiner states it “would have been obvious to one of ordinary skill in the art ... also allow the requester system to view availability data and meeting requests by the requester in order to more efficiently let the requester gain service in a more timely manner” The Applicant traverses this statement.

In Gisby the requestor may be eventually connected with any one of the Agents 1-4. In contrast, in Vaios it is known which specific target the requestor may eventually be connected to. Because, it is not known in Gisby which agent the requestor may eventually be connected it cannot be known which agents status to be displayed to the requestor. There may be hundreds of agents. Further, from the point of view of the requestor in Gisby, the status of all agents is “unavailable” until just before the requestor is connect to the agent. For at least these reasons, there would be no reason to display the status of (many?) agents to the requestor in Gisby, and thus no reason to combine the cited art.

The Applicant further believes that Claim 56 is allowable for at least the same reasons as Claim 1.

Regarding Claim 57, the Applicant believes that Claim 57 is allowable for at least the same reasons as Claims 55 and 56.

Regarding Claim 80, the Applicant believes that Claim 80 is allowable for at least the same reasons as Claims 1 and 56.

Claim 83, 86 and 90 were rejected under 35 U.S.C. 103(a) as being unpatentable over Gisby in view of Vaios.

Regarding Claim 83,

Claim 83 recites:

83. (Currently Amended) The method of claim 1, wherein the common party is the requestor R-A and R-B and the common party participates in both of the meetings M-A and M-B.

In rejecting Claim 83, the Examiner admits that Gisby “does not expressly disclose that the common party is the requestor R-A and R-B and that common party participates in both of the meetings M-A and M-B.” The Examiner further suggests that

Vaios teaches that a “requestor has two or more real-time meetings in the queue, and thus is the common party in both of the meeting[s]...”

The Applicant respectfully points out that none of the art cited by the Examiner teaches “*and the common party participates in both of the meetings M-A and M-B,*” as recited in Claim 83. Nor has the Examiner suggested such a teaching. Further, Vaios teaches that the requestor participates in only one of the two or real-time meetings in the queue. See for example, Col. 6 lines 6-10 which state “[i]f, however, additional queued requests were spawned as part of a multiple-agent or multiple-resource request on behalf of this caller, then at step 424, all of the remaining pending requests are deleted from the system.” Thus, once the first meeting is established all other pending requests are cancelled and a second pending meeting does not occur.

The Applicant, therefore, request that the Examiner specifically point out a teaching of “*and the common party participates in both of the meetings M-A and M-B,*” or allow Claim 83.

Regarding Claims 86, the Applicant believes that Claim 86 is allowable for at least the same reasons as Claim 1 from which it depends.

Regarding Claims 90, the Applicant believes that Claim 86 is allowable for at least the same reasons as Claim 88 from which it depends.

Regarding New Claim 92, the Applicant believes that Claim 92 is supported by the specification as filed. See, for example, Fig. 9(f) and the discussion of Fig. 9(f) at page 15 lines 21-30. As well as page 15 lines 9-10 which teach “Figs. 9(e)-9(g) show another exemplary user interface on a user’s system, where the user is both a requestor and a target for different ones of a plurality of RTMs.”

Regarding New Claim 93, the Applicant believes that Claim 93 is supported by the specification as filed. See, for example, page 15 lines 21-30.

Regarding New Claim 94, the Applicant believes that Claim 94 is supported by the specification as filed. See, for example, page 9 lines 9-12.

Regarding New Claim 95, the Applicant believes that Claim 92 is supported by the specification as filed. See, for example, page 7 lines 1-3, page 9 lines 4-7 and page 16 lines 19-21.

Regarding New Claim 96, the Applicant believes that Claim 92 is supported by the specification as filed. See, for example, page 8 line 28 through page 9 line 7.

The Applicant believes that all pending claims are allowable and respectfully requests that the Examiner issue a Notice of Allowance. Should the Examiner have questions, the Applicant's undersigned representative may be reached at the number provided below.


In addition, Applicant respectfully invites the Examiner to contact Applicant's representative if the Examiner believes it will help expedite furtherance of this application.

As the next response in this application may be an appeal, the Applicant requests that the Examiner take particular notice of arguments that were previously made and not responded to, so that any issues are clear before appeal.

RESPECTFULLY SUBMITTED,
BRADLEY S. TEMPLETON

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By: _____


Steven M. Colby, Reg. No. 50,250
CARR & FERRELL LLP
2200 Geng Rd.
Palo Alto, CA 94303
Phone: (650) 812-3424
Fax: (650) 812-3444